

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**SHANADOLYN JOHNSON AND  
BRIAN A. BREWER - TRUSTEE**

**v.**

**WILMINGTON SAVINGS FUND  
SOCIETY, FSB**

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**CIVIL ACTION NO. 4:18-CV-01284**

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**PLAINTIFFS' DESIGNATION OF EXPERTS**

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Plaintiffs Shanadolyn Johnson and Brian A. Brewer - Trustee hereby designates the following individual as an expert witness who may be called to testify at the time of trial of this matter pursuant to Federal Rule of Civil Procedure 26(a)(2):

1. Identity of the expert witness:

Robert C. Vilt - JD, CPA  
Vilt and Associates, P.C.  
5177 Richmond Avenue, Suite 1142  
Houston, Texas 77056  
Telephone: 713.840.7570  
Facsimile: 713.877.1827  
Email: clay@viltlaw.com

2. Subject matter of expert testimony:

Mr. Vilt will provide testimony concerning the reasonableness of the attorneys' fees incurred by the Plaintiff to prepare and prosecute the instant lawsuit as well as in opposition to any legal fees claimed by the Defendant. Enclosed herewith is a copy of Mr. Vilt's current resume.

Plaintiffs designate any and all expert witnesses that have been designated by other parties.

Plaintiffs reserve the right to elicit any expert opinion or lay opinion testimony from any of the individuals previously identified by any other party as persons with knowledge of facts relevant to this proceeding, which testimony would be truthful, would be of benefit to the court and/or the jury determining the factual issues in this lawsuit, and which would not violate any existing Court order, the Federal Rules of Civil Procedure, or the Federal Rules of Evidence.

Plaintiffs also reserve the right to call as an expert witness any of the expert witnesses designated by any other party in this case. Plaintiffs further reserve the right to supplement this designation with additional designations of experts within the time limits imposed by the Court or any alternations of same by subsequent Court order or agreement of the parties, or pursuant to the Federal Rules of Civil Procedure and/or the Federal Rules of Evidence.

Plaintiffs reserve the right to withdraw the designation of any expert and to aver that any such previously designated expert will not be called as a witness at trial, and to redesignate same as a consulting expert, who cannot be called by opposing counsel.

Respectfully submitted,

VILT AND ASSOCIATES, P.C.

By: /s/ Robert C. Vilt  
Robert C. Vilt  
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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was forwarded to all counsel of record on this the 14<sup>th</sup> day of September, 2018.

Michael F. Hord Jr.  
Eric C. Mettenbrink  
Hirsch & Westheimer, P.C.  
1415 Louisiana, 36<sup>th</sup> Floor  
Houston, TX 77002

/s/ Robert C. Vilt  
ROBERT C. VILT